

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

The Woodlands Pride, Inc.; Abilene
Pride Alliance; Extragrams, LLC; 360
Queen Entertainment LLC; Brigitte
Bandit,

Plaintiffs,

v.

Civil Action No. 4:23-cv-02847

Angela Colmenero, in an official
capacity as Interim Attorney General of
Texas; Montgomery County, Texas;
Brett Ligon, in an official capacity as
District Attorney of Montgomery
County; City of Abilene, Texas; Taylor
County, Texas; James Hicks, in an
official capacity as District Attorney of
Taylor County; Delia Garza, in an
official capacity as County Attorney of
Travis County; Joe D. Gonzales, in an
official capacity as District Attorney of
Bexar County,

Defendants.

PLAINTIFFS' MOTION FOR LEAVE TO FILE EXCESS PAGES

Pursuant to Local Rule 7 and Judge Hittner's court procedures, Plaintiffs The Woodlands Pride, Inc.; Abilene Pride Alliance; Extragrams, LLC; 360 Queen Entertainment LLC; and Brigitte Bandit (collectively, "Plaintiffs") bring this Motion

for Leave to File Excess Pages to file a single 42-page omnibus response/reply to four briefs of Defendants, namely: Dkt. 42 (Motion to Dismiss by City of Abilene); Dkt. 44 (Response by City of Abilene to Plaintiffs' Motion for Preliminary Injunction); Dkt. 49 (Joint Motion to Dismiss by Montgomery County, Texas; Brett Ligon, in an official capacity as District Attorney of Montgomery County; Taylor County, Texas; James Hicks, in an official capacity as District Attorney of Taylor County; Delia Garza, in an official capacity as County Attorney of Travis County; Joe D. Gonzales, in an official capacity as District Attorney of Bexar County); and Dkt. 52 (Motion to Dismiss and Response by Angela Colmenero, in an official capacity as Interim Attorney General of Texas).

Plaintiffs require excess pages for their brief because they are responding to four separate briefs, three of which were filed by separate Defendants and raise non-duplicative arguments. Rather than burden this Court with four different responses/replies—each of which could be up to 20 pages—Plaintiffs have endeavored to conserve judicial resources by filing a single response brief.

This request for leave to file excess pages is not brought for purposes of delay but to enable the Plaintiffs to ensure that all relevant issues are adequately briefed to the Court in the most efficient manner possible.

Plaintiffs ask the Court to grant this motion for leave to file excess pages.

Respectfully submitted,

/s/ Brian Klosterboer

Brian Klosterboer, *attorney-in-charge*

TX Bar No. 24107833

SDTX No. 3314357

Chloe Kempf

TX Bar No. 24127325

SDTX No. 3852674

Thomas Buser-Clancy

TX Bar No. 24078344

SDTX No. 1671940

Edgar Saldivar

TX Bar No. 24038188

SDTX No. 618958

Adriana Pinon

TX Bar No. 24089768

SDTX No. 1829959

ACLU FOUNDATION OF TEXAS, INC.

P.O. Box 8306

Houston, TX 77288

Tel. (713) 942-8146

Fax (713) 942-8966

bklosterboer@aclutx.org

ckempf@aclutx.org

tbuser-clancy@aclutx.org

esaldivar@aclutx.org

apinon@aclutx.org

Attorneys for Plaintiffs

/s/ Emily Rohles

Ali Andrews

TX Bar No. 24059381

SDTX No. 2247339

Emily Rohles

TX Bar No. 24125940

SDTX No. 3715273

BAKER BOTTS L.L.P.

910 Louisiana Street

Houston, TX 77002

Tel. (713) 229-1234

Fax (713) 229-1522

Ali.Andrews@BakerBotts.com

Emily.Rohles@BakerBotts.com

Derek McDonald

TX Bar No. 00786101

SDTX No. 18546

Maddy Dwertman

TX Bar No. 24092371

SDTX No. 3853795

BAKER BOTTS L.L.P.

401 S. 1st Street, Suite 1300

Austin, TX 78704

Tel. (512) 322-2500

Fax (512) 322-2501

Derek.McDonald@BakerBotts.com

Maddy.Dwertman@BakerBotts.com

Brandt Thomas Roessler

TX Bar No. 24127923

SDTX No. 3853796

BAKER BOTTS L.L.P.

30 Rockefeller Plaza

New York, NY 10112

Tel. (212) 408-2500

Fax (212) 408-2501

Brandt.Roessler@BakerBotts.com

CERTIFICATE OF SERVICE

I hereby certify that, on August 27, 2023, a true and correct copy of the foregoing was served via the CM/ECF system to all counsel of record.

/s/ Emily Rohles

Emily Rohles